

**From:** [Williamson, Deborah](#)  
**To:** [Adam Langley](#); [Cam Hillyer](#); [drukavina@munsch.com](mailto:drukavina@munsch.com); [tberghman@munsch.com](mailto:tberghman@munsch.com); [cwhite@munsch.com](mailto:cwhite@munsch.com); [kdm@romclaw.com](mailto:kdm@romclaw.com); [stthomas@romclaw.com](mailto:stthomas@romclaw.com); [Martin W. Seidler \(marty@seidlerlaw.com\)](mailto:Martin W. Seidler (marty@seidlerlaw.com)); [Randy Pulman](#)  
**Cc:** [McIntyre, Maria](#)  
**Subject:** Genesis Networks Telecom Services, Inc. - 2004 Notices  
**Date:** Wednesday, August 28, 2024 11:38:09 AM  
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Counsel, we represent Endeavor Managed Services, Inc. (“Endeavor”) in connection with the Genesis Networks Telecom Services LLC (the “Debtor”) bankruptcy.

We have been working with Adam and Cam on an agreed production of documents. As part of that process, we have identified sources of information which are NOT Endeavor data. Endeavor will NOT be searching or reviewing data which is not generated by Endeavor. However, the sources of data which have been identified may be relevant to the pending 2004 notices or otherwise.

I propose that you collectively reach an agreement as to who has the rights to access the data described below or get a court order on the issue if an agreement cannot be reached.

Specifically, it is my understanding that the following sources have been identified:

**Genesis SharePoint** - this is a Microsoft portal of online documents apparently related to multiple Genesis entities (not just the Debtor) and perhaps other entities. I understand that the data may be segregated by entity and would be accessible with an Admin password. It is my understanding that Endeavor can assist in providing an Admin password.

**Genesis Telecom financials** – This data is on an Endeavor server. Endeavor can provide the data once direction is provided. I do not know if there is data unrelated to the Debtor.

**Genesis Telecom email** – It is my understanding that Mr. James Goodman has a license to access this data. I do not know whose emails would be located. I also do not know if there is data unrelated to the Debtor.

Again, Endeavor will NOT be reviewing the data so I cannot provide any additional information as to what may or may not be available. And, again, Endeavor will not be making any decisions regarding who should have access.

Please let me know what is decided regarding access.

Thank you.

**Deborah D. Williamson**  
Member

D 210-554-5275 ▪ M 210-241-0591  
DWilliamson@dykema.com ▪ dykema.com

[BIO](#) [VCARD](#) [LINKEDIN](#)

112 E. Pecan Street, Suite 1800  
San Antonio, Texas 78205

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